

National Environmental Achievement Track

Application Form

Blue Ridge Paper Products, Inc.

Name of facility

Name of parent company (if any)

175 Main Street

Street address

Box 4000

Street address (continued)

Canton, North Carolina 28716

City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name Robert V. Williams

Title Director, Environmental, Health and Safety Affairs

Phone (828) 646-2033

Fax (828) 646-6892

E-mail willib@blueridgepaper.com

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility. Identify your environmental requirements.



1	What do you do or make at your facility?	Uncoated freesheet paper and paperboard products
2	List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.	SIC 2611 2621 2631 NAICS
3	Does your company meet the Small Business Administration definition of a small business for your sector?	☐ Yes
4	How many employees (full-time equivalents) currently work at your facility?	☐ Fewer than 50☐ 50-99☐ 100-499☐ 500-1,000☑ More than 1,000

Section A, continued

5	Does your facility have an EPA ID number(s)? If yes, list in the right-hand column.		□ No 89
6	Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.		
7	Check the appropriate box in the right-hand column.		ne requirements above. ed the Checklist with my application.
8	Optional: Is there anything else you would like to tell us about your facility?	May 1999. Alo employee-own Inc. The Canto many of its exis of Blue Ridge F process of revi- were managed Some long star environmental responsibilities	ill has been under new ownership since ong with financial investors, it is now an ed company, Blue Ridge Paper Products on Mill is still in the process of converting sting programs and documents to those Paper Products Inc. It is also in the sing or establishing new programs that I by the previous corporate EHS staff. Inding facility practices, such as training for all employees whose job is can significantly impact the are now being incorporated into the EMS.
		mills in the wor in compliance of federal governmany other fact Elemental Chlor Delignification of and Bleach Filt BFR process re	ill ranks among the top pulp and paper rid for water quality. The mill is already with the effluent guidelines portion of the ment's new Cluster Rules, years before cilities. Canton's kraft pulp mill is prine Free (ECF), using Oxygen with 100% chlorine dioxide bleaching trate Recycle (BFR) technology. The ecovers naturally ocurring minerals in the chemicals used to bleach pulp white

Because BFR technology recycles the chemicals and

water used in the bleaching process, water usage, bleach plant effluent and effluent color are reduced, allowing the Canton Mill to dramatically reduce its impact on the environment.

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



Tell us about your EMS.

1	each element below as defined in the instructions.	
	a. Environmental policy	⊠ Yes
	b. Planning	⊠ Yes
	\mathcal{C} . Implementation and operation	⊠ Yes
	d. Checking and corrective action	⊠ Yes
	e. Management review	⊠ Yes
2	Have you completed at least one EMS cycle (plan-do-check-act)?	⊠ Yes
3	Did this cycle include both an EMS and a compliance audit?	⊠ Yes
4	Have you completed an objective self-assessment or third-party assessment of your EMS?	⊠ Yes
	If yes, what method of EMS assessment did you	Self-assessment
	use?	☐ GEMI ☐ Other
		☐ CEMP
		American Forest & Paper Association Corporate Survey to Verify Compliance with EHS Principles
		☐ Third-party assessment
		☐ ISO 14001 Certification
		Other

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



Tell us about your past achievements and future commitments.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the curren	t level?
COD Discharges to Water	Quantity 13.86	Units lbs./ 1000 lbs.	Quantity 8.78	Units lbs./ 1000 lbs.
		pulp		pulp

i. How is the current level an improvement over the previous level?

This improvement is a significant reduction of COD discharge to water and is also a significant improvement in the overall efficiency of the facility's operations. This level of performance is less than 1/3 of the proposed Cluster Rule Limitation for Bleached Papergrade Kraft Mills.

ii. How did you achieve this improvement?

As a result of substantial capital investment in BFR (Bleach Filtrate Recycle), a proprietary technology that allows for bleach filtrates to be recycled in its softwood fiber line. The Canton Mill is the only bleach kraft mill in the world that employs this technology.

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
Water Use	Quantity 26.8	Units million gallons daily	Quantity 24.3	Units million gallons daily
i. How is the current level an previous level?	improvement over	the	'	,
On average, the facility has	s reduced the amou	unt of intake water b	y two million gallons	s per day.
ii. How did you achieve this i	mprovement?			
This improvement was ach throughout the mill. Focuse contact cooling water.	.	•		

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?	Material Use (Purchased lime reduction)	
b. Is this aspect identified as significant in your EMS?	⊠ Yes □ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	✓ Option A: Absolute value✓ Option B:	55 tons/day (Quantity/Units)
	In terms of	(Quantity/Units)

 ○ Option A: Absolute value ○ Option B: In terms of units of production or output 	40 tons/day (Quantity/Units) (Quantity/Units)
The objective is to reduce the purchased by 15 tons per da accomplished by capital inveimprovements and equipmen	y. This will be stment resulting in process it upgrades. This will also
Material use (Reduce influen	t fiber losses)
⊠ Yes □ No	
Option A: Absolute value Option B: In terms of units of production or output	28 tons/day (Quantity/Units) (Quantity/Units)
Option A: Absolute value Option B: In terms of units of production or output	20 tons/day (Quantity/Units) (Quantity/Units)
The objective is to increase of useage by 8 tons per day. The efficiency of the facility's operamount of solid waste general objective will be achieved through the objective will be achieved the	his will improve the rations and reduce the ated and landfilled. This ough process and
	Absolute value Option B: In terms of units of production or output The objective is to reduce the purchased by 15 tons per day accomplished by capital inve improvements and equipment reduce the amount of solid w facility and landfilled. Material use (Reduce influent Yes No Option A: Absolute value Option B: In terms of units of production or output Option B: Absolute value Option B: In terms of units of production or output Option B: In terms of units of production

Third aspect you've selected		
a. What is the aspect?	Total Solid Waste (Recycle	of depoly)
b. Is this aspect identified as significant in your EMS?	⊠ Yes □ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value	350 tons/month (Quantity/Units)
	Option B: In terms of units of production or output	(Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of	Option A: Absolute value	1,100 tons/month (Quantity/Units)
production or output.	Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement?	The objective is to increase coated paperboard material month. This objective will be process changes and increa process.	recycled by 750 tons per eachieved by making
Fourth aspect you've selected		
a. What is the aspect?	Expected Lifetime Waste of paperboard packaging efficient	
b. Is this aspect identified as significant in your EMS?	⊠ Yes □ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of	Option A: Absolute value	
production or output.	Option B: In terms of units of production or output	(Quantity/Units) 282 lbs/3000 sq. ft. (Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of	Option A: Absolute value	(Quantity/Units)
production or output.	Option B:In terms ofunits of productionor output	265 lbs/ 3000 sq. ft. (Quantity/Units)
e. How will you achieve this improvement?	The objective of this improve basis weight of our product I average. This will result in re our product. This change ca applying Design for the Envi Analysis thinking. Reducing our products lighter. A lighter	ine by 5% to 6% on educing the fiber content of ame about as a result of ronment and Life Cycle the fiber content will make

reduced solid waste generated by our end-users. For example, the 23 point paperboard grade product that we produce for milk and juice cartons is currently 282 pounds per 3000 square feet of product area, after capital investment and equipment upgrade the weight will be reduced to approximately 265 pounds per 3000 square feet.

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

Section D

Tell us about your public

What do you need to do?

- Describe your approach to public outreach. List three references who are familiar with your facility.

1	How do you identify and respond to community concerns?	The Canton Mill's primary means of identifying and responding to community concerns is through the Community Advisory Committee that normally meets once every three months. It is made up of local citizens, the purpose of which is to discuss their concerns that relate to the facility and educate them about the facility's operations.
		Canton Mill management also meets periodically with an alliance of local nonprofit organizations in order to communicate on environmental performance and report on different environmental initiatives.
2	How do you inform community members of important matters that affect them?	Community members are informed of pertinent information through the Community Advisory Committee, periodic leadership forums, legislative updates and through a regular mill tour program.
3	How will you make the Achievement Track Annual	☐ Website www.
	Performance Report available to the public?	☐ Newspaper
		Other
		The report will also be disseminated through the existing community outreach programs.

4	Are there any ongoing citizen suits against your facility?	☐ Yes	⊠ No
	If yes, describe briefly in the right-hand column.		

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Haywood Scenic Waterways Assocation	Ron Moser, Director	828-456-5195
State/Local Regulator	North Carolina Department of Environment and Natural Resources, Division of Environmental Management	Forrest Westall, Regional Water Quality Supervisor	828-251-5208
Other community/local reference	Haywood County	Jack Horton, Haywood County Manager	828-648-2363

Section E

On behalf of Blue Ridge Paper Products, Inc. Canton Mill [my facility],

Application and Participation Statement.

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track
 EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal,
 and local environmental requirements, in place at the facility, and the EMS will be maintained for the
 duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title George Henson, Vice President - Mill Division

Facility Name Canton Mill

Facility Street Address 175 Main Street

Facility ID Numbers NCD 003148889

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center c/o Industrial Economics Incorporated 2067 Massachusetts Avenue Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following *Checklist* is provided to assist facilities in answering *Section A*, *Tell us about your facility*, " *Question 6*. The *Checklist* is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The *Checklist* is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Name: Canton Pulp & Paper Mill		Canton Pulp & Paper Mill	
Fa	cility Location:	Canton, NC	
Fac	cility ID Number(s):	NCD00314889	
(ati	tach additional sheets if ned	ressary)	
<u>Aiı</u>	Pollution Regulations		Check All That Apply
11.	Permits and Registration of A	Prohibitions and Restrictions andards ipment ting	
Otl	her Federal, State, Tribal	or Local Air Pollution Regulations Not Liste	d Above (identify)
13.			
14.			

Hazardous Waste Management Regulations

1.	Identification and Listing of Hazardous Waste (40 CFR 261) - Characteristic Waste	
	- Listed Waste	
2.	Standards Applicable to Generators of Hazardous Waste (40 CFR 261)	
	- Manifesting	
	- Pre-transport requirements	
	- Record keeping/reporting	\boxtimes
3.	Standards Applicable to Transporters of Hazardous Waste (40 CFR 262)	
	- Transfer facility requirements	
	- Manifest system and record-keeping	
	- Hazardous waste discharges	
4.	Standards for Owners and Operators of TSD Facilities (40 CFR 264)	
	- General facility standards	
	- Preparedness and prevention	
	- Contingency plan and emergency procedures	
	- Manifest system, record keeping and reporting	
	- Groundwater protection	
	- Financial requirements	
	- Use and management of containers	
	- Tanks	
	- Waste piles	
	- Land treatment	\Box
	- Incinerators	
5.	Interim Status Standards for TSD Owners and Operators (40 CFR 265)	
6.	Interim Standards for Owners and Operators of New Hazardous Waste	_
	Land Disposal Facilities (40 CFR 267)	
7.	Administered Permit Program (Part B) (40 CFR 270)	
0.41		D 14 N
	her Federal, State, Tribal or Local Hazardous Waste Management sted Above (identify)	Kegulations Not
8.		
9.		

Hazardous Materials Management Control of Pollution by Oil and Hazardous Substances (33 CFR 153) 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) Hazardous Materials Transportation Regulations (49 CFR 172-173) Worker Right-to-Know Regulations (29 CFR 1910.1200) 5. Community Right-to-Know Regulations (40 CFR 350-372) Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not **Listed Above** (*identify*) **Water Pollution Control Requirements** 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) 2. Designation of Hazardous Substances (40 CFR 116) 3. Determination of Reportable Quantities for Hazardous Substances 4. NPDES Permit Requirements (40 CFR 122) 5. Toxic Pollutant Effluent Standards (40 CFR 129) 6. General Pretreatment Regulations for Existing and New Sources 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) 10. Water Quality Standards 11. Effluent Limitations for Direct Dischargers 12. Permit Monitoring/Reporting Requirements 13. Classifications and Certifications of Operators and Superintendents of **Industrial Wastewater Plants** 14. Collection, Handling, Processing of Sewage Sludge 15. Oil Discharge Containment, Control and Cleanup 16. Standards Applicable to Indirect Discharges (Pretreatment)

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17.	
18.	

Drinking Water Regulations Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or **Subsurface Sources** 5. **Underground Injection Control Requirements** Monitoring, Reporting and Record Keeping Requirements for Community Water Systems Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above (identify) **Toxic Substances** 1. Manufacture and Import of Chemicals, Record Keeping and Reporting 2. Import and Export of Chemicals (40 CFR 707) 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) 4. Chemical Information Rules (40 CFR 172) 5. Health and Safety Data Reporting (40 CFR 716) 6. Pre-Manufacture Notifications (40 CFR 720) PCB Distribution Use, Storage and Disposal (40 CFR 761) 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

10.	
11.	

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above

(identify)

Pesticide Regulations

1.	FIFRA Pesticide Use Classification (40 CFR 162)			
2.	Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)			
3.	Certification of Pesticide Applications (40 CFR 171)			
4.	Pesticide Licensing Requirements			
5.	Labeling of Pesticides			
6.	Pesticide Sales, Permits, Records, Application and Disposal Requirements			
7.	Disposal of Pesticide Containers			
8.	Restricted Use and Prohibited Pesticides			
Ot	her Federal, State, Tribal or Local Pesticides Regulations Not listed Above (ide	ntify)		
9.				
10.				
En	vironmental Clean-Up, Restoration, Corrective Action			
1.	Comprehensive Environmental Response, Compensation and Liability Act (Super (identify)	Superfund)		
2.	RXRA Corrective Action (identify)			
	her Federal, State, Tribal or Local Environmental Clean-up, Restoration, Corretion Regulations Not Listed Above (identify)	ective		
3.				
4.				